

March 9, 2017

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Connect America Fund*, WC Docket No. 10-90;
Rural Health Care Support Mechanism, WC Docket No. 02-60 –
Notice of *Ex Parte* Presentation

Dear Ms. Dortch:

On Tuesday, March 7 and Wednesday, March 8, 2017, Leonard Steinberg of Alaska Communications and I met with Jay Schwarz in the Chairman's office, and Kris Monteith, Lisa Hone, Ryan Palmer, Dana Zelman, Radhika Karmarkar, Travis Litman, Jonathan Lechter, and Soumitra Das, all of the Wireline Competition Bureau. Richard Cameron also attended our meeting with Ms. Karmarkar, Ms. Zelman, and Messrs. Litman, Lechter, and Das.

These discussions focused on infrastructure investment and expansion in Alaska and the need for targeted support for critical facilities, especially for facilities serving the increasing demands of rural health providers, and middle mile infrastructure serving Bush communities.

Mr. Steinberg also discussed the need for comprehensive updating of the Rural Health Care program, which has remained under a funding cap since it was initiated in 1997, not even being adjusted for inflation. To meet growing demands for high-capacity, high-performance networks serving Rural Health Care providers in Alaska and elsewhere, the budget should be increased to reflect inflation as well as the technological advances in tele-medicine. Surplus funds from other universal service programs could be immediately redirected to this use.

In addition to addressing the adequacy of funding, Mr. Steinberg raised the outdated nature of the present rules governing the Telecommunications Program within the Rural Health Care ("RHC") support mechanism, and the paucity of public FCC guidance to USAC, RHC provider applicants, and telecommunications service providers as to how to apply rules which have scarcely been revisited in 20 years. The resulting delays and uncertainty hamper the deployment of advanced, competitively priced, packet-switched services and state-of-the-art solutions that can far outstrip the speed of legacy DS-3 circuits. Particularly in rural and remote

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parts of Alaska, RHC funding for such advanced services is critically needed and can dramatically improve health care outcomes while reducing health care costs. Requests for RHC support also deserve a USAC response within a reasonable time frame, given the short funding cycle. The USAC decision process should be reviewed by the Commission to ensure it is efficient and effective in promoting advanced, life-saving and money-saving health care communications solutions for rural America.

Mr. Steinberg also touched upon Alaska Communications' Connect America Fund ("CAF") Phase I and Phase II build-out progress, reporting requirements, and performance obligations. Mr. Steinberg urged the new Chairman to revisit the unfunded voice mandate, as well as the "high cost" threshold, in the Alaska Communications CAF Phase II order.

The enclosed chart illustrating the relative size of the RHC program was distributed in these meetings.

Please direct any questions regarding this matter to me.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Karen Brinkmann".

Karen Brinkmann

Counsel to Alaska Communications